



Control Number: 48785



Item Number: 92

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**SOAH CONSOLIDATED DOCKET NO. 473-19-1265**  
**PUC CONSOLIDATED DOCKET NO. 48785**

**JOINT APPLICATION OF ONCOR §  
ELECTRIC DELIVERY COMPANY §  
LLC, AEP TEXAS INC., AND LCRA §  
TRANSMISSION SERVICES §  
CORPORATION TO AMEND THEIR §  
CERTIFICATES OF CONVENIENCE §  
AND NECESSITY FOR 345-KV §  
TRANSMISSION LINES IN PECOS, §  
REEVES, AND WARD COUNTIES, §  
TEXAS (SAND LAKE TO SOLSTICE §  
AND BAKERSFIELD TO SOLSTICE) §  
§**

**BEFORE THE STATE OFFICE 2:04**

2019 JAN 11 PM  
PUBLIC UTILITY COMMISSION  
FILING CLERK

**OF**

**ADMINISTRATIVE HEARINGS**

**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION  
TO ONCOR ELECTRIC DELIVERY COMPANY, LLC (ONCOR) AND  
AEP TEXAS INC. (AEP TEXAS)  
QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-4**

Pursuant to 16 Texas Administrative Code (TAC) § 22.144, the Commission Staff of the Public Utility Commission of Texas (Commission) requests that Oncor Electric Delivery Company, LLC (Oncor) and AEP Texas Inc. (AEP Texas), by and through their attorneys of record, provide the following information and answer the following question(s) under oath. The question(s) shall be answered in sufficient detail to fully present all of the relevant facts, within the time limit provided by the Presiding Officer or within 20 days, if the Presiding Officer has not provided a time limit. Please copy the question immediately above the answer to each question. These question(s) are continuing in nature, and if there is a relevant change in circumstances, submit an amended answer, under oath, as a supplement to your original answer. State the name of the witness in this cause who will sponsor the answer to the question and can vouch for the truth of the answer.

Provide an original and three copies of your answers to the questions to the Filing Clerk, Public Utility Commission of Texas, 1701 N. Congress Avenue, P.O. Box 13326, Austin, Texas 78712-3326.

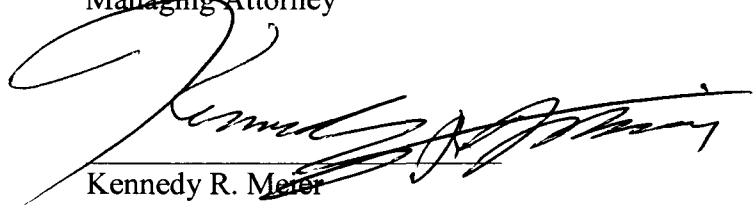
Dated: January 11, 2019

Respectfully submitted,

**PUBLIC UTILITY COMMISSION OF TEXAS  
LEGAL DIVISION**

Margaret Uhlig Pemberton  
Division Director

Karen S. Hubbard  
Managing Attorney

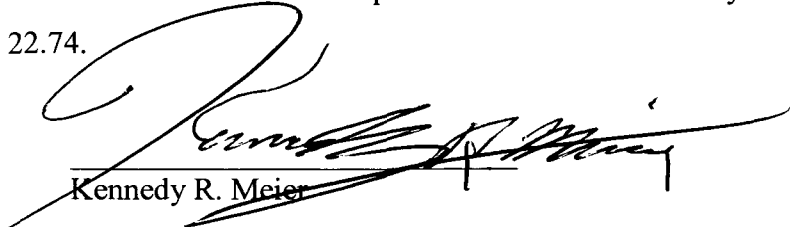


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**CERTIFICATE OF SERVICE**

I certify that a copy of this document will be served on all parties of record on January 11, 2019, in accordance with 16 TAC § 22.74.



Kennedy R. Meier

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**DEFINITIONS**

- A. "Oncor," "AEP Texas," "the Company," or "you" refers to Oncor Electric Delivery Company, LLC and AEP Texas Inc. and any person acting or purporting to act on their behalf, including without limitation, attorneys, agents, advisors, investigators, representatives, employees or other persons.
- B. "Document" includes any written, recorded, or graphic matter, however produced or reproduced, including but not limited to correspondence, telegrams, contracts, agreements, notes in any form, memoranda, diaries, voice recording tapes, microfilms, pictures, computer media, work papers, calendars, minutes of meetings or other writings or graphic matter, including copies containing marginal notes or variations of any of the foregoing, now or previously in your possession. In the event any documents requested by this Request for Information have been transferred beyond the Company's control, describe the circumstances under which the document was destroyed or transferred and provide an exact citation to the subject document. In the event that documents containing the exact information do not exist, but documents do exist which contain portions of the required information or which contain substantially similar information, then the definition of "documents" shall include the documents which do exist and these documents will be provided.

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AEP TEXAS INC. (AEP TEXAS)  
QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-4**

**INSTRUCTIONS**

- 1) Pursuant to 16 TAC § 22.144(c)(2), Staff requests that answers to the requests for information be made under oath.
- 2) Please copy the question immediately above the answer to each question. State the name of the witness in this cause who will sponsor the answer to the question and can vouch for the truth of the answer.
- 3) These questions are continuing in nature, and if there is a relevant change in circumstances, submit an amended answer, under oath, as a supplement to your original answer.
- 4) Words used in the plural shall also be taken to mean and include the singular. Words used in the singular shall also be taken to mean and include the plural.
- 5) The present tense shall be construed to include the past tense, and the past tense shall be construed to include the present tense.
- 6) If any document is withheld under any claim of privilege, please furnish a list identifying each document for which a privilege is claimed, together with the following information: date, sender, recipients or copies, subject matter of the document, and the basis upon which such privilege is claimed.
- 7) Pursuant to 16 TAC § 22.144(h)(4), if the response to any request is voluminous, please provide a detailed index of the voluminous material.
- 8) Staff requests that each item of information be made available as it is completed, rather than upon completion of all information requested.

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- Staff 1-1      Please confirm that the Solstice Substation upgrade costs associated with the Oncor/AEP Sand Lake to Solstice project do not include any portion of the Solstice Substation upgrade costs associated with the LCRA/AEP Bakersfield to Solstice project.
- Staff 1-2      Is any portion of the \$10,111,000 listed for the Estimated AEP Texas Substation Facilities Costs in Attachment 3 of the application for the Sand Lake to Solstice project included in the \$38,457,000 listed for the Estimated Total Solstice Substation Cost in Attachment 3 of the application for the Bakersfield to Solstice project? Please generally describe the upgrades being made for each portion.
- Staff 1-3      Are all of the costs associated with Materials and Equipment, ROW and land acquisition, and Engineering and Design incorporated in the cost estimate included in the application for the Bakersfield to Solstice project, or are some of these costs included in the application for the Sand Lake to Solstice project as well?
- Staff 1-4      Considering *both* the Sand Lake to Solstice and Bakersfield to Solstice projects together, what is the total estimated cost of the upgrades to AEP's Solstice substation?